

### REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Office Action dated July 1, 2006 (U.S. Patent Office Paper No. 20060522). In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

#### Status of the Claims

As outlined above, claims 1-11 stand for consideration in this application, while claims 1-11 are being amended to correct formal errors and to more particularly point out and distinctly claim the subject invention.

All amendments to the application are fully supported therein, including page 22, line 10, to page 28, line 13. Applicant hereby submits that no new matter is being introduced into the application through the submission of this response.

#### Formal Rejections

##### U.S.C. §112, first paragraph rejection

Claim 1-11 were rejected under 35 U.S.C. §112, second paragraph, as failing to comply with the enablement requirement. In particular, the Office Action contends that the limitation of "covering the stored-location information" recited in claims 1, 4, and 10 and the limitation of "identifying a relationship between a first structure...managed by said second format," recited in claims 1 and 4 and the limitation of "sending said converted stored location...to said second host computer," recited in claim 1 were not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention.

Claims 1, 4, and 10 are being amended to correct formal errors and to more particularly point out and distinctly claim the subject invention. In particular, the limitation of "identifying a relationship between a first structure of said stored-location information managed by said first format and a second structure of said stored-location information managed by said second format" is replaced with the limitation of "replacing an ID of said second host computer and a type of said second operating system corresponding to the ID."

The details of the present invention as now recited in claims 1, 4, and 10 are described on page 22, line 9 - page 28, line 13. In particular, the step of identifying an ID of said

second host computer and a type of said second operating system corresponding to the ID is described on page 22, line 9 - page 23, line 1 and Fig. 9. As shown in Fig. 9, a host table includes a relationship between an ID of each host computer and a type of a file system used in the operating system of each host computer. If the type of the file system used in the second operating system is different from the target file system, the conversion program is executed according to the type of the file system.

The step of converting said first information of said file store location into said second information of said file store location is described on page 22, line 10 - page 28, line 13. Information of a file store location is presented by, for example, a block number of a first block of the file and a pointer pointing to a data area in which the file is stored. In this step, the block number of the first block of the file and the pointer managed in the first operating system which uses the first format are converted to those managed in the second operating system which uses the second format.

The step of "sending said converted stored location...to said second host computer is being deleted.

Therefore, all the elements as now recited in claims 1, 4, 10 and their dependent claims 2-3, 5-9, and 11 are supported by the specification and Figures submitted. Accordingly, withdrawal of this rejection is respectfully requested.

#### U.S.C. §112, second paragraph Rejection

Claim 1-11 were rejected under 35 U.S.C. §112, second paragraph, for being as being indefinite as failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention.

As set forth above, claims 1-11 are being amended to move particularly point out and distinctly claim the subject matter of the present invention. Accordingly, withdrawal of this rejection is respectfully requested.

#### Prior Art Rejections

##### The First 35 U.S.C. §102(e) rejection

Claims 1-11 were rejected under 35 U.S.C. §102(e) as being anticipated by Probert, Jr. et al (US Pat. No. 6,549,918). As mentioned above, claims 8-10, 12, and 15 are being cancelled, and therefore the rejections of claims 8-10, 12, and 15 are moot. Applicants respectfully traverse the rejection of claims 1-11 for the reasons set forth below.

According to the M.P.E.P. §2131, a claim is anticipated under 35 U.S.C. §102 (a), (b), and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

Claims 1, 4 and 10

The Office Action contends that Probert discloses a storage system that is connected to a first host computer, which uses a first operating system for managing stored location information of a file using a first format, and that is connected to a second host computer, which uses a second operating system for managing stored location information of the file using a second format different from said first format, said storage system comprising: a plurality of disk drives for storing data; a disk controller comprising an interface for connecting to said first host computer and said second host computer, and an interface for connecting to said disk drives; wherein said disk controller comprises: a means for holding stored location information of a file, which is stored in any one of said plurality of disk drives, in said drives, in said second format, said stored location information of the file of the second format being corresponding to the stored location information of the file in said first format; a means for reading said file on the basis of the stored location information in said second format when access request to access said file is issued from said second host computer, and converting the stored location information of said file in said first format into stored location information in said second format based on a fixed length block. Applicants respectfully disagree.

The present invention is directed to a method for sharing a file stored in a storage system among a plurality of hosts, each of which uses a different operating system. The present invention as now recited in claim 1 provides the steps of identifying an ID of the second host computer and a type of the second operating system corresponding to the ID; converting the information of the file store location managed by a first format into the second information of the file store location managed by a second format; and reading data corresponding to the file on the basis of the second information of the file store location from the disk drives.

As set forth above, a file store location is presented by, for example, a block number of a first block of the file and a pointer pointing to a data area in which the file is stored. The information of these numbers is varied according to a format which an operating system uses.

Since each operating system uses a different format, an operating system of a host computer which desires to access data of which file is managed by another host computer has to be identified in order to convert the information of a file store location to another information of a file store location suitable to the host computer. In the present invention, as set forth above, an operating system of a host computer which attempts to access data is identified by an ID of the host computer. The operating system of the host computer is identified by the ID because the ID corresponds to the host computer and its operating system.

In contrast, Probert is directed to a method of converting the information from its storage format to the format expected by the program. In other words, Probert merely shows that a native file is converted to be read and written in various application programs. Probert, however, says nothing about conversion of the information of a file store location to enable a host computer using an operating system different from that originally used to manage the file to access the data in the file. Furthermore, Probert says nothing about the step of identifying an ID of another host computer and a type of another operating system corresponding to the ID.

Therefore, Probert does not show every element recited in claim 1. Accordingly, claim 1 is not anticipated by Probert.

#### Claims 4 and 10

Claims 4 and 10 have the substantially same features as those of claim 1. As such, the arguments set forth above are equally applicable here. Claim 1 being allowable, claims 4 and 10 must also be allowable.

#### Claims 2-3, 5-9 and 11

As to dependent claims 2-3, 5-9 and 11, the arguments set forth above with respect to independent claim 1, 4, and 10 are equally applicable here. The base claim being allowable, claims 2-3, 5-9 and 11 must also be allowable.

#### Conclusion

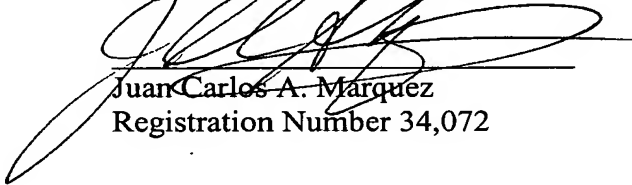
In view of all the above, Applicants respectfully submit that certain clear and distinct differences as discussed exist between the present invention as now claimed and the prior art references upon which the rejections in the Office Action rely. These differences are more than sufficient that the present invention as now claimed would not have been anticipated nor

rendered obvious given the prior art. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application as amended is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicant's undersigned representative at the address and phone number indicated below.

Respectfully submitted,

\_\_\_\_\_  
Stanley P. Fisher  
Registration Number 24,344

  
\_\_\_\_\_  
Juan Carlos A. Marquez  
Registration Number 34,072

**REED SMITH LLP**  
3110 Fairview Park Drive  
Suite 1400  
Falls Church, Virginia 22042  
(703) 641-4200

**August 14, 2006**  
SPF/JCM/YM